

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION
IN ADMIRALTY

TIFFANY N. PROVENCE, AS THE
PERSONAL REPRESENTATIVE OF
THE ESTATE OF JUAN ANTONIO
VILLALOBOS HERNANDEZ,

Plaintiff,

vs.

CASE NO. 2:21-cv-965-RMG

UNITED STATES OF AMERICA,
CROWLEY MARITIME
CORPORATION, CROWLEY
GOVERNMENT SERVICES, INC.,
DETYENS SHIPYARDS, INC., AND
HIGHTRAK STAFFING, INC. D/B/A
HITRAK STAFFING, INC.,

Defendants.

CONTINUED

30(b)(6) ZOOM

DEPOSITION OF: CROWLEY GOVERNMENT SERVICES, INC
BY: PAUL VARGHESE

DATE: June 21, 2022

TIME: 10:07 A.M.

LOCATION: Offices of
Crowley Maritime Corporation
9487 Regency Square Boulevard
Jacksonville, FL

TAKEN BY: Counsel for the Plaintiff

REPORTED BY: Wanda K. Cecil
Certified Court Reporter
(Appearing by Zoom)

1 is -- that is the intent of writing this like that.

2 Q. Okay. And in the davit repairs, how did
3 Crowley tell the shipyard to do the work?

4 A. We told the shipyard to restrain the
5 davit arm when the falls are removed and conduct the
6 repairs and then reinstall the falls and bring the
7 boat back. That is in Specification 601.

8 Q. And what is the MSC general technical
9 requirement guidance on how to instruct the shipyard
10 to do the work?

11 A. Give the intent of work, general design
12 of the work. Not to tell them how to do their job.

13 Q. Okay. And let's go back to how Crowley
14 tagged out the lifeboat davit system as a whole in
15 order to support the shipyard. Where was the first
16 tag out?

17 A. The first tag out normally at the
18 control room, where the main breaker is.

19 Q. In the engine control room?

20 A. Engine control room. Yes.

21 Q. Okay. And where is the second tag out?

22 A. That is located at the operating station
23 where the lifeboats are operated, lower and raise.

24 Q. Out on the deck?

25 A. Yeah. It's on the deck.

1 Q. Okay. And how many tags is that?

2 A. That is two.

3 Q. Okay. And how many methods of isolation
4 is that?

5 A. Two.

6 Q. And earlier in your testimony you give
7 an example of overhauling the main engine. To tag
8 out the main engine, you would tag out the starter,
9 the fuel oil, the start air distribution valve, and
10 the power to the engine?

11 A. Yeah.

12 Q. Now, how would you expect the shipyard
13 to deal with, once the engine is tagged out like
14 that, individual episodes of stored energy such as
15 lifting a piston out of the main engine?

16 A. Yeah. The shipyard, they use mitigation
17 methods and then also the proper lifting tactics to,
18 you know, lift that thing to make sure that there's
19 no -- it did not release and no accident happens.

20 Q. What machine would they use to lift the
21 piston?

22 A. The crane or chain fall sometime.

23 Q. (Unintelligible.)

24 THE COURT REPORTER: Wait. Ryan, you're
25 breaking up again.

1 BY MR. GILSENAN:

2 Q. Sorry. A crane or a chain fall?

3 A. Yeah.

4 Q. Would you expect tag outs to occur in
5 addition to the engine as described on the
6 individual crane lifts and chain falls lifts?

7 A. It's never done.

8 Q. Okay.

9 THE COURT REPORTER: I'm sorry. Say
10 that again. What was your answer?

11 THE WITNESS: It is never done.

12 THE COURT REPORTER: Got you.

13 BY MR. GILSENAN:

14 Q. Okay. And how would that main engine
15 example apply to the davit system as a whole, if it
16 would apply at all?

17 A. The davit system is the same. The davit
18 system -- the lifeboat was tagged out. The davit
19 arm is only a part of that. So when the -- when the
20 shipyard lifts that off or the shipyard working on
21 that one, the shipyard could use their rigging
22 procedures or their safety procedures to do that
23 work. And Crowley does not tag out that arm by
24 itself. Crowley will not tell how you lift it off
25 or how you tie it or how you do that work. Crowley